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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CHRISTOPHER ROBERTSON,

Plaintiff,

v.

ANDREW M. SAUL,
Commissioner of Social Security,

Defendant.

Case No. 2:19-cv-01202-KJD-EJY

**STIPULATION FOR
EXTENSION OF TIME FOR
DEFENDANT TO FILE
HIS CROSS-MOTION TO AFFIRM AND
RESPONSE TO PLAINTIFF'S MOTION
FOR REVERSAL
(FIRST REQUEST)**

IT IS HEREBY STIPULATED, by and between the parties, by and through their respective counsel of record, that, with the Court's approval, Defendant shall have an extension of time to file his Cross-Motion to Affirm and Response to Plaintiff's Motion for Reversal. The current due date is January 22, 2020. The new date will be March 18, 2020. All other deadlines will extend according to the court's scheduling order dated October 22, 2019 (Dkt. No. 14).

Defense counsel needs an extension of time because the attorney responsible for briefing needs additional time to complete review and analysis of the 973-page record, consider the issues raised in

1 Plaintiff's brief, determine whether options exist for settlement, accommodate competing workload
2 demands, draft the response, and go through the necessary in-house reviews. With regard to competing
3 workload demands, in December, defense counsel filed six briefs. In January, defense counsel has nine
4 additional briefs due in District Courts, about half of which courts have continued once; she is bringing a
5 sanctions case against a claimant's representative; she has a hearing on the merits, and she has response
6 to a 406B motion due. In February, defense counsel has eight merit briefs due, five of which have been
7 continued once. Currently, the Office of the General Counsel has undergone an unforeseen reduction of
8 several staff attorneys; Social Security is under a hiring freeze and management would have difficulty
9 reassigning this case to another attorney. Management is currently considering transferring one case
10 with a brief due in January to someone else, but not this one. This request is made in good faith with no
11 intention to delay unduly the proceedings. Counsel apologizes to the Court and Plaintiff for any
12 inconvenience this delay may cause. This is Defendant's first request for an extension.

13
14 Respectfully submitted this 17th day of January 15, 2020.

15 DAYLE ELIESON
United States Attorney

16 Dated: January 15, 2020

/s/ S. Wyeth McAdam
S. WYETH McADAM
Special Assistant United States Attorney
Counsel for Defendant

18 Dated: January 17, 2020

/s/ Joshua R Harris*
Joshua R Harris
Richard Harris Law Firm
Counsel for Plaintiff
(*authorized via email)

21 OF COUNSEL:
22 DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX

24 IT IS SO ORDERED:

25 DATED: January 21, 2020


ELAYNA J. YOUCHAK
UNITED STATES MAGISTRATE JUDGE